

Conrail Railyard TAG: The Remedial Project Manager's Perspective

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As the Remedial Project Manager (RPM) for the Conrail Site in Elkhart, Indiana, I deal frequently with the Technical Assistance Grant (TAG) for the Site, in terms of both the TAG recipient, John Wallace, and the citizens group, Citizens' League for Environmental Action Now (CLEAN), that applied for and received the TAG.

When I was assigned as the RPM for the Conrail Site in 1993, the TAG was already in place. The previous RPM had been involved in reviewing the application for the TAG for the content and the amount of funding requested. The RPM is part of the approval process for the original TAG application and any subsequent funding increases. I have been involved in approving one significant funding increase.

The TAG has allowed the local citizens, through CLEAN, to be fully informed regarding technical and remedy implementation issues. EPA has provided Mr. Wallace and CLEAN with all draft remedial documents for the site. Mr. Wallace and CLEAN submit comments for inclusion in EPA's comment letters, just as the State or any other regulatory party would do. Mr. Wallace has also attended some of the negotiation sessions between EPA and the Responsible Parties. Mr. Wallace's involvement serves two very useful purposes: 1) the community perspective is included in the decisions made at the site, and 2) the community is informed by a neutral third party regarding the merits, deficiencies, and technical jargon and concepts involved in the remedial decisions at the Site. Although EPA also, to a degree, serves these functions, Mr. Wallace brings the perspective a neutral, technically proficient third party to the table and advocates for the community, who has to literally live with the decisions made at the Site. The trust factor has been very strong, largely due to the involvement of Mr. Wallace via the TAG. EPA also benefits greatly from a fully informed community in that comments from the community are very focused, and the community can act in the role of an additional peer review with a perspective that no other party can fully understand.

The TAG has been very successful at the Conrail Site. The community and EPA's needs have been met more efficiently and quickly with the involvement of the TAG recipient. Several factors have led to the success of the TAG at the Conrail Site:

1. First and foremost, the citizens' group, CLEAN, does not have a hidden political agenda. The group draws from a diverse group of citizens, all of whom live in the area impacted by the Site. Since there is no hidden agenda, CLEAN's comments and input are frank, logical, understandable, and come from the community itself. EPA and CLEAN may not always agree, but decisions are made with consideration given to all perspectives, with all parties fully informed, and with justification provided for all decisions that are made at the Site;

2. EPA has shared as much information as possible with the community, and vice-versa. By providing advance copies of draft Site documents and allowing the TAG recipient to sit in on some of the negotiations with the Responsible Parties, the trust factor is very high among EPA and the community. The community views EPA's openness as being forthcoming and complete with site information and feels that EPA does not have "something to hide"; and

3. All of the interested parties (EPA, the State, and CLEAN) have cooperated fully in a common goal-providing as much information as possible so that the appropriate cleanup can be selected and implemented at the Site. For example, CLEAN was essential in soliciting access for hooking up the residences to an alternate water supply (94+% of all residents were hooked up), and CLEAN has cooperated fully with all requests for information or assistance from EPA and the State. The State took charge of providing all residents with well sampling information and point-of-use water filters, where needed. EPA built community concerns into the selected remedy via previous discussions and public comments on the Record of Decision; it was so much easier for EPA to address public comments when they were submitted as a unified voice as opposed to numerous individual comments which may not have a common thread.

In summary, I have enjoyed working with CLEAN and the TAG recipient. The Superfund process at the Conrail Site has been greatly enhanced by their involvement, and the cooperation of EPA, the State, and CLEAN has been truly exemplary. The process that has occurred at the Conrail Site is how the TAG process was envisioned; however, I am aware that this is certainly not always the case. The three points listed above were all essential elements in the success of the TAG at the Site, and I would strongly recommend that these issues be considered and addressed at any site where a TAG is currently being utilized or is under consideration.